

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

)	
K.O., agent of by and through their parents and)	
next friends, E.O. and L.J; E.O., Jr., agent of by)	
and through their parents and next friends, E.O.)	
and L.J.; E.O.; L.J.; C.J. agent of by and through)	
his father and next friend F.C.; and F.C.,)	
)	C.A. No. 20-12015-TSH
Plaintiffs,)	
)	
v.)	
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	
)	

**JOINT MOTION FOR A FURTHER EXTENSION
OF TIME TO RESPOND TO THE PLAINTIFFS' COMPLAINT**

The parties herein jointly move this Honorable Court for a further extension of time to February 1, 2022 for the United States to respond to the complaint. Over the past 60 days, the United States and the group of counsel coordinating negotiations on behalf of plaintiffs and claimants (“Coordinating Counsel”) have continued to work diligently in an effort to resolve the many district court cases and administrative tort claims that have been filed by claimants across the country, arising from family separations at the U.S./Mexico border that occurred during the prior administration. An agreement has not been reached. However, a further abeyance will allow the parties to continue focusing their efforts on attempting to resolve these matters.

Accordingly, the parties jointly request that this action, including all proceedings and case deadlines, be held in abeyance for an additional 60 days. If the parties determine within the next

60 days that they are unable to reach an agreement, the parties will stipulate at that point to lift the stay.

WHEREFORE, the parties jointly move this Honorable Court for an extension of time to February 1, 2022 to respond to the complaint.

Respectfully submitted,

NATHANIEL R. MENDELL
Acting United States Attorney

By: /s/ Rayford A. Farquhar
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: December 1, 2021

/s/ Rayford A. Farquhar
RAYFORD A. FARQUHAR
Assistant United States Attorney

LOCAL RULE 7.1 CERTIFICATION

I, Rayford A. Farquhar, Assistant United States Attorney herein certify that on Wednesday December 1, 2021, I electronically communicated with Attorney Joseph Cacace, and he joined in the filing of this motion.

/s/ Rayford A. Farquhar
RAYFORD A. FARQUHAR
Assistant United States Attorney